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# EXHIBIT “A”

Estate lawsuit

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**IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT  
ST. CLAIR COUNTY, ILLINOIS**

Shayala McDowell, Individually and as )  
Special Administrator of the Estate of )  
Dayman Warren, Deceased, )  
 )  
Plaintiffs, )

vs. )

Case No.: 2024-LA- 0476

CSN Entertainment, LLC, and )  
Registered Agent : )  
Laninya Cason )  
2 Park Place )  
Swansea, IL 62226 )

Beast Mode, LLC, )  
Registered Agent : )  
Fred D. Forest )  
967 Keeneland Road )  
Florissant, MO 63034 )

Defendants. )

**COMPLAINT**

Plaintiffs, Shavala McDowell, Individually and as Special Administrator of the Estate of Dayman Warren, Deceased ("Plaintiffs"), through their attorneys, Ted N. Gianaris and Joshua A. Edelson of Gianaris Trial Lawyers, LLC state as follows for their Complaint against Defendants:

**GENERAL FACT ALLEGATIONS & PARTIES**

1. On Sunday, October 1, 2023, Dayman Warren ("Decedent"), a 27-year-old male, visited the CSN Entertainment, LLC ("CSN") club in East St. Louis, Illinois for the grand opening with his friends.

2. CSN had hired Beast Mode, LLC ("Beast") to provide security guards for the grand opening in East St. Louis, Illinois.

3. One of the Beast security guards/bouncers employed by Beast that worked on the night of the grand opening was Terrell Anderson, a convicted felon and sex offender.

4. At approximately 1:30 a.m., Terrell Amerson, took a knee and fired two shots at Dayman Warren as he and his friends were leaving CSN, which injured and killed Decedent.

5. Defendant, CSN Entertainment, LLC, is an Illinois limited liability corporation, with a principal place of business located at 933-935 St. Louis Ave., East St. Louis, Illinois, and having a sole member of Roslyn Carter who resides at 2614 Bond Ave East St. Louis, Illinois.

6. Defendant, Beast Mode, LLC, is a Missouri limited liability corporation having a sole member of Fred D. Forest who resides at 967 Keeneland Rd. Florissant, Missouri.

7. This Court has jurisdiction over all defendants as all the acts giving rise to this cause of action occurred within the State of Illinois.

8. Venue is proper in this judicial district, in that the incident giving rise to this cause of action occurred within St. Clair County, Illinois.

**COUNT 1 – WRONGFUL DEATH  
NEGLIGENT HIRING, TRAINING, RETENTION, AND/OR SUPERVISION  
(vs. BEAST MODE, LLC)**

9. Plaintiff restates and incorporates the paragraphs above as if fully set forth herein.

10. Beast owed a duty to the patrons, including Decedent, of CSN where it provided security services, to hire, train, retain, and/or supervise individuals who were qualified to provide security services in a safe and responsible manner, and who did not present a danger to patrons, including Plaintiff.

11. Beast owed a duty to the patrons of CSN where it provided security services to hire, train, retain, and/or supervise individuals who would use ordinary care in while providing security services, including the appropriate use of restraints and/or force in providing security services.

12. Beast breached its duty owed to Plaintiff and was negligent in the following respects, to-wit:

- a. Failed to hire employees who would safely and reasonably provide security services;
- b. Failed to retain employees who would safely and reasonably provide security services;
- c. Failed to properly supervise its security employees;
- d. Failed to adequately train its security employees;
- e. Failed to provide instruction to its security employees regarding proper and reasonable methods, restraints, and/or force in carrying out security services;
- f. Failed to provide instruction to its security employees; and/or,
- g. Failed to use the degree of care as would an ordinary business providing security services under the circumstances so present.

13. As a direct and proximate result of the aforesaid negligence, Plaintiff was injured and eventually died.

14. By reason of Decedent's death, Plaintiff has suffered damages, including grief, the loss of support, comfort, love, affection, protection, and society of the Decedent.

WHEREFORE, Plaintiff, Shayala McDowell, Individually and as Special Administrator for the Estate of Dayman Warren, prays for judgment against Defendant, Beast Mode, LLC, in an amount that exceeds the jurisdictional amount for this Court, plus costs of suit, and for any other relief this Honorable Court deems proper.

**COUNT 2 – SURVIVAL ACTION**  
**NEGLIGENT HIRING, TRAINING, RETENTION, AND/OR SUPERVISION**  
**(v. Beast Mode, LLC)**

15. Plaintiff realleges and incorporates the paragraphs above as if fully set forth herein.



16. As a direct and proximate result of Beast's aforementioned acts and/or omissions, Decedent experienced conscious pain and suffering before his death and incurred medical expenses by way of doctors, hospitals, and drugs, before his death and Beast is liable for such damages.

WHEREFORE, Plaintiff, Shayala McDowell, Individually and as Special Administrator for the Estate of Dayman Warren, prays for judgment against Defendant, Beast Mode, LLC, in an amount that exceeds the jurisdictional amount for this Court, plus costs of suit, and for any other relief this Honorable Court deems proper.

**COUNT 3 – WRONGFUL DEATH  
NEGLIGENCE: *RESPONDEAT SUPERIOR*  
(*vs. Beast Mode, LLC*)**

17. Plaintiff restates and incorporates the paragraphs above as if fully set forth herein.

18. At all times relevant hereto, Beast was acting by and through its employees and/or agents, including but not limited to Terrell Anderson.

19. Under the doctrine of *respondeat superior*, Beast is liable for all the wrongful and negligent acts and omissions of its individual officers, agents, and employees, acting within the course and scope of such individuals' employment, including without limitation Terrell Amerson.

20. At all times relevant hereto, Terrell Amerson was acting within the course and scope of his employment with Beast.

21. Terrell Anderson's negligent actions injured and killed Decedent and are therefore imputed on Beast.

22. By reason of Decedent's death, Plaintiff has suffered damages, including grief, the loss of support, comfort, love, affection, protection, and society of the Decedent.

WHEREFORE, Plaintiff, Shayala McDowell, Individually and as Special Administrator for the Estate of Dayman Warren, prays for judgment against Defendant, Beast Mode, LLC, in an amount that exceeds the jurisdictional amount for this Court, plus costs of suit, and for any other relief this Honorable Court deems proper.

**COUNT 4 – SURVIVAL ACTION  
NEGLIGENCE: *RESPONDEAT SUPERIOR*  
(vs. Beast Mode, LLC)**

23. Plaintiff restates and incorporates the paragraphs above as if fully set forth herein.

24. As a direct and proximate result of Beast's aforementioned acts and/or omissions, Decedent experienced conscious pain and suffering before his death and incurred medical expenses by way of doctors, hospitals, and drugs, before his death and Beast is liable for such damages.

WHEREFORE, Plaintiff, Shayala McDowell, Individually and as Special Administrator for the Estate of Dayman Warren, prays for judgment against Defendant, Beast Mode, LLC, in an amount that exceeds the jurisdictional amount for this Court, plus costs of suit, and for any other relief this Honorable Court deems proper.

**COUNT 5 – WRONGFUL DEATH  
NEGLIGENT HIRING & SELECTION  
(vs. CSN Entertainment, LLC)**

25. Plaintiff restates and incorporates the paragraphs above as if fully set forth herein.

26. At all relevant times, CSN had contracted with Beast to provide security services at CSN's property.

27. At all relevant times, CSN had a duty to hire and select an experienced, qualified, and/or competent security service.

28. In disregard and breach of the aforementioned duties, CSN hired and selected Beast, which was an inexperienced, unqualified, and/or incompetent security service that employed inexperienced, untrained, unqualified, and/or unfit security guards, namely Terrell Amerson.

29. As a direct and proximate result of one or more of the aforesaid negligent and careless acts or omissions by CSN, Decedent was shot and killed by a Beast security guard.

30. By reason of Decedent's death, Plaintiff has suffered damages, including grief, the loss of support, comfort, love, affection, protection, and society of the decedent.

WHEREFORE, Plaintiff, Shayala McDowell, Individually and as Special Administrator for the Estate of Dayman Warren, prays for judgment against Defendant, CSN Entertainment, LLC, in an amount that exceeds the jurisdictional amount for this Court, plus costs of suit, and for any other relief this Honorable Court deems proper.

**COUNT 6 – SURVIVAL ACTION  
NEGLIGENT HIRING & SELECTION  
(vs. CSN Entertainment, LLC)**

31. Plaintiff restates and incorporates the paragraphs above as if fully set forth herein.

32. As a direct and proximate result of CSN's aforementioned acts and/or omissions, Decedent experienced conscious pain and suffering before his death and incurred medical expenses by way of doctors, hospitals, and drugs, before his death and CSN is liable for such damages.

WHEREFORE, Plaintiff, Shayala McDowell, Individually and as Special Administrator for the Estate of Dayman Warren, prays for judgment against Defendant, CSN Entertainment, LLC, in an amount that exceeds the jurisdictional amount for this Court, plus costs of suit, and for any other relief this Honorable Court deems proper.

Respectfully submitted,

**GIANARIS TRIAL LAWYERS, LLC**

By: /s/ Joshua A. Edelson

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